

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WENDY GAUTHIER,

Plaintiff,

v.

SUNHEALTH SPECIALTY SERVICES,
INC. and SUNBRIDGE HEALTHCARE
CORPORATION,

Defendants.

Civil Action No.: 4:05-cv-40119

**ANSWER of SUNHEALTH SPECIALTY SERVICES, INC.
to the AMENDED COMPLAINT**

Parties

1. The Defendant, SunHealth Specialty Services, Inc. lacks sufficient knowledge to either admit or deny the allegations contained in paragraph 1.

2-3. Admitted.

Facts

4-10. The Defendant, SunHealth Specialty Services, Inc., lacks sufficient knowledge to either admit or deny the allegations contained in paragraphs 4 through 10.

11. Denied.

12. Admitted that the Plaintiff's employment was terminated for failing to comply with the conditions of her employment and that a violation of the no call/no show policy is a terminable offense because it potentially jeopardizes facility residents by creating the risk of understaffing.

13. Denied.

14. Denied.

Count I

- 15. The Defendant incorporates its responses to Paragraphs 1 through 14 above.
- 16. The Defendant, SunHealth Specialty Services, Inc., lacks sufficient knowledge to either admit or deny the allegations contained in paragraph 16.
- 17. Denied.
- 18. Denied.
- 19. Denied.

WHEREFORE, the Defendant respectfully requests that this Honorable Court dismiss Count I with prejudice.

Count II

- 20. The Defendant incorporates its responses to Paragraphs 1 through 19 above.
- 21-24. Denied.

WHEREFORE, the Defendant respectfully requests that this Honorable Court dismiss Count II with prejudice.

Count III

- 25. The Defendant incorporates its responses to Paragraphs 1 through 24 above.
- 26-29. Denied.

WHEREFORE, the Defendant respectfully requests that this Honorable Court dismiss Count III with prejudice.

Count IV

25[sic]. The Defendant incorporates its responses to Paragraphs 1 through 29 above.

26-29[sic]. Denied.

WHEREFORE, the Defendant respectfully requests that this Honorable Court dismiss
Count IV with prejudice.

Respectfully Submitted,
SunHealth Specialty Services, Inc.,
by its attorney,

/s/ Michael Williams

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Michael Williams (BBO# 634062)
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CERTIFICATE OF SERVICE

I hereby certify that this Document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on June 13, 2006.

/s/ Michael Williams